

**IN THE U.S. DISTRICT COURT FOR MARYLAND,  
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.	)	
	)	
Plaintiff	)	
v.	)	Case No. PJM 08 cv 0921
	)	
WORLD AVENUE USA, LLC, et al.	)	
Defendants	)	
_____	)	

**DEFENDANT, WORLD AVENUE USA, LLC’S ADDENDUM TO ITS  
MOTION FOR ENTRY OF PROTECTIVE ORDER**

Defendant, WORLD AVENUE USA, LLC (“WAUSA”), by and through undersigned counsel, hereby respectfully clarifies for the Court that Tina Dempsey-Jones was not noticed as a Rule 30(b)(6) deponent, but as stated in WAUSA’s Motion for Protective Order as to the Notice of Deposition of Douglas Kropp, Verizon Fiber Solutions Center served by Plaintiff, BEYOND SYSTEMS, INC. (“BSI”), she testified as a Verizon representative and was deposed by both parties. *See* DE 475 at pp. 2-3. Therein, Mrs. Dempsey-Jones testified, *inter alia*, that BSI was in violation of its service agreement by using the service to act as an ISP. *Id.* Mrs. Dempsey-Jones’ designation as a Verizon corporate representative is confirmed by her representation during the deposition by Mr. Alexander V. Shekhter, Esq., Assistant General Counsel of Verizon. *See* DE 475-4 at p. 4.

WAUSA respectfully requests the Court considers this Addendum as part of its Motion for Protective Order as to the Notice of Deposition of Douglas Kropp, Verizon Fiber Solutions Center [DE 11] and incorporates it by reference.

Dated: November 3, 2010

Respectfully submitted,

/s/

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